

REMARKS

I. Formalities

Applicant thanks the Examiner for acknowledging and approving the Formal Drawings filed on April 20, 2001.

The Examiner has indicated that the foreign references cited on the PTO Form 1449 submitted with the Information Disclosure Statement (“IDS”) filed on January 8, 2004 have not been considered because English translations of the documents were not included. However, Applicant respectfully submits that Applicant is not required to provide a full English translation for each reference that is not in the English language. In fact, 37 C.F.R. § 1.98(a)(3)(i) requires that Applicant provide only:

A concise explanation of the relevance, as it is presently understood by the individual designated in § 1.56(c) most knowledgeable about the content of the information, of each patent, publication, or other information listed that is not in the English language. The concise explanation may be either separate from applicant's specification or incorporated therein.

Moreover, Applicant respectfully submits that the concise explanation requirement has been fully met with respect to the foreign references cited on the PTO Form 1449 submitted with the IDS filed on January 8, 2004 by providing an English language translation of those portions of a corresponding Japanese Patent Office Action (dated October 14, 2003, citing these foreign references) which indicate the degree of relevance found by the Japanese Patent Office. In particular, MPEP §609(A)(3) provides that:

Where the information listed is not in the English language, but was cited in a search report or other action by a foreign patent office in a counterpart

foreign application, the requirement for a concise explanation of relevance can be satisfied by submitting an English language version of the search report or action which indicates the degree of relevance found by the foreign office. (*Id.*)

Therefore, the Examiner's failure to consider the above-listed Japanese language references when originally submitted with the IDS filed on January 8, 2004 was contrary to the directive clearly set forth in MPEP §609(A)(3). Accordingly, Applicant respectfully requests that this error on the part of the Examiner be corrected by considering these references.

In view of the foregoing, the Examiner is respectfully requested to consider the above-listed references, and to return an initialed form PTO-1449 (enclosed herewith for the Examiner's convenience) listing these references.

II. Status of the Application

By the present Amendment claims 14, 28 and 42 have been amended for reasons of grammar and clarity. Claims 4-5, 7-14, 18-19, 21-28, 32-33 and 35-42 are all the claims pending in the Application, with claims 4-5, 7-14, 18-19, 21-28, 32-33 and 35-42 being in independent form. Claims 7-9, 11-13, 21-23, 25-28, 35-37 and 39-42 have been rejected.

The present Amendment addresses each point of objection and rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

III. Allowable Subject Matter

Applicant thanks the Examiner for indicating that claims 4-5, 10, 18-19, 24, 32-33 and 38 are allowed.

IV. Claim Rejections under 35 U.S.C. § 103 – Howard in view of Tsiounis

The Examiner has rejected claims 7, 21 and 35 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Publication No. 2003/0204610 to Howard *et al.* (hereinafter “Howard”) in view of U.S. Publication No. 2001/0039535 to Tsiounis *et al.* (hereinafter “Tsiounis”).

Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

Independent claims 7, 21 and 35 require (among other things):

...wherein when said authentication server does not detect a match between said authentication information input from said authentication terminal and said personal authentication data, said authentication server notifies said authentication terminal that the client is not authenticated.

In the Amendment filed on November 17, 2004, Applicant advanced arguments that neither Howard, Tsiounis, nor any combination thereof, teaches or suggests that when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated. In response, the grounds of rejection cite claim 11 of Howard as allegedly teaching this feature. (Office Action, page 3). Applicant respectfully disagrees with the grounds of rejection.

Howard teaches that an authentication database 112 is coupled to an authentication server 110. (Paragraph 0018). Howard also teaches that the authentication server 110 authenticates the user of a client computer 100 by requesting authenticating information, such as the user’s login ID and password. (Paragraph 0019).

Contrary to the allegations in the grounds of rejection, claim 11 of Howard teaches that a message is transmitted from the authentication server to the network server (i.e., not to an authentication terminal as recited in claims 7, 21 and 35), wherein said message indicates to the network server whether the user has been authenticated by the authentication server. (See claim 11). Thus, claim 11 of Howard teaches that, based on said message transmitted from the authentication server to the network server, if the user is authenticated, then the network server grants the user access to the network server. (See claim 11). Alternatively, Howard teaches that based on said message transmitted from the authentication server to the network server, if the user is not authenticated by the authentication server, then the network server denies the user access to the network server. (See claim 11).

However, Howard provides no teaching or suggestion whatsoever that when the authentication server 110 does not detect a match between authentication information input from an authentication terminal and personal authentication data, then the authentication server 110 notifies said authentication terminal that the client is not authenticated. Indeed, the Examiner alleges that the client computer 100, as taught in Howard, corresponds to “an authentication terminal,” as recited in claims 7, 21 and 35. But, no portion of Howard, including claim 11, teaches or suggests that when the authentication server 110 does not detect a match between authentication information input from the client computer 100 and personal authentication data, then the authentication server 110 notifies the client computer 100 that the client is not authenticated. To the contrary, Howard teaches that if the user-entered information does not match the information stored in the authentication database 112, then the authentication server

110 generates and communicates a web page to the user indicating that the login ID and password combination were not valid. (See paragraph 0034).

Hence, neither Howard, Tsiounis, nor any combination thereof, teaches or suggests that when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated, as recited in claims 7, 21 and 35, and these claims are patentable over the cited references for *at least* these reasons. Accordingly, Applicant respectfully requests that the Examiner withdraw these rejections.

V. Claim Rejections under 35 U.S.C. § 103 – Howard in view of Sher

The Examiner has rejected claims 8, 11-13, 22, 25-27, 36 and 39-41 under 35 U.S.C. §103(a) as being unpatentable over Howard in view of U.S. Publication No. 2001/0018660 to Sehr (hereinafter “Sehr”). Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

A. Independent Claims 8, 22 and 36

Independent claims 8, 22 and 36 recite (among other things):

...wherein when said authentication server does not detect a match between said authentication information input from said authentication terminal and said personal authentication data, said authentication server notifies said authentication terminal that the client is not authenticated...

In view of the similarity between these requirements and the requirements discussed above with respect to independent claims 7, 21 and 35, Applicant respectfully submits that the

foregoing arguments as to the patentability of independent claims 7, 21 and 35 apply *at least* by analogy to claims 8, 22 and 36. Specifically, as discussed above, Howard fails to teach or suggest the feature of, when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated. Further, Sehr also fails to teach or suggest this feature. As such, it is respectfully submitted that claims 8, 22 and 36 are patentably distinguishable over Howard, Sehr, and any combination thereof, for *at least* these reasons.

Additionally, independent claims 8, 22 and 36 recite:

... wherein said authentication terminal is
installed at a ticket gate of a public
transportation facility.

The Examiner acknowledges that Howard does not teach or suggest an authentication terminal which is installed at a ticket gate of a public transportation facility, as recited in claims 8, 22 and 36. (Office Action page 6, lines 8-10). Nevertheless, the grounds of rejection rely on Sher as allegedly teaching or suggesting this feature. (Office Action page 6, lines 8-10). In particular, the grounds of rejection allege that the passage in Sher “the electronic rendering of services,” corresponds to the feature of “wherein said authentication terminal is installed at a ticket gate of a public transportation facility,” as recited in claims 8, 22 and 36. (Paragraph 0025; *see* Office Action page 6, lines 8-10). Applicant respectfully disagrees with the grounds of rejection.

In contrast to the recitations of claims 8, 22 and 36, Sher teaches an automated admission system for sporting activities or other entertainment programs. (*See* Abstract; paragraph 0024, lines 1-3). As taught in Sher, visitor card devices or ticketing cards may be used to gain admission to a particular entertainment event, and may also be used for the purchase of goods and services provided during, or in connection with the event. (*See e.g.*, Paragraph 0024, lines 6-7; paragraph 0028, lines 1-4; paragraph 0056, lines 1-4; Figure 3).

It is incumbent upon the Examiner to establish a factual basis to support the legal conclusion of obviousness. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988). This burden can only be satisfied by an objective teaching in the prior art or by cogent reasoning that the knowledge is available to one of ordinary skill in the art. *In re Lahu*, 747 F.2d 703, 223 USPQ 1257 (Fed. Cir. 1984). Mere allegations by the Examiner that certain differences between the claimed subject matter and the prior art are obvious do not create a presumption of unpatentability. *In re Soli*, 317 F.2d 941, 137 USPQ 797 (CCPA 1963).

Here, the Examiner baldly asserts that the teachings in Sher that “[t]he system and methods allow the issuance of a multi-service visitor card to individuals for the admission to events such as sporting activities or other entertainment programs, as well as for the electronic rendering of services,” corresponds to the feature of “wherein said authentication terminal is installed at a ticket gate of a public transportation facility,” as recited in claims 8, 22 and 36. (Paragraph 0025; *see* Office Action page 6, lines 8-10). However, the Examiner has not provided any evidentiary support whatsoever for this assertion and has, therefore, failed to establish the requisite factual basis to support a determination of obviousness.

In fact, Sher provides no teaching or suggestion regarding the feature of an authentication terminal installed at a ticket gate of a public transportation facility, as recited in claims 8, 22 and 36. Moreover, contrary to the grounds of rejection, the passage in Sher “the electronic rendering of services,” does not correspond to the feature of “wherein said authentication terminal is installed at a ticket gate of a public transportation facility,” as recited in claims 8, 22 and 36. (Paragraph 0025).

To the contrary, Sher teaches that a plurality of products and services may be rendered to visitors who attend an event and who possess a multi-service visitor card. (Paragraph 0028, lines 1-4). More particularly, Sher teaches that services may be rendered to visitors such as fast food vending services, retail outlet services, concession stand services, souvenir vending services, and internet services. (Paragraph 0028, lines 5-7). Further, Sher teaches that the aforementioned plurality of services may be rendered electronically, i.e., by electronic payments, and such electronic payment is what the cited passage “the electronic rendering of services,” as used in Sher, connotes to one of ordinary skill. (See paragraph 0028). Thus, Sher teaches that an “electronic monetary value or other electronic payment means” may be stored in the visitor card and that electronic payments made via the visitor card are cleared and credited via a transaction processor. (Paragraph 0028, lines 7-14).

More particularly, Sher teaches that the aforementioned plurality of services may be rendered electronically by processing transactions using the point of sale terminal 313, the database scheme 110, and the card read/write device 311. (Paragraph 0056 – 0057; Figure 3). However, Sher does not teach or suggest that the point of sale terminal 313, the database scheme

110, and the card read/write device 311 are installed at a ticket gate of a public transportation facility, as recited in claims 8, 22 and 36.

In addition, as taught in Sher, the cited passage “the electronic rendering of services,” also connotes that services may be rendered electronically to remote locations (e.g., a home or business premises). (Paragraph 0038, lines 10-13). Sher teaches that such services rendered to remote locations may include advanced ticket purchase services, ticket seating assignment selection, downloading data and information about sporting events, and visitor card positioning services to visitors subscribing to a Global Positioning System. (*See e.g.*, Paragraph 0134; paragraph 0136; paragraph 0137). Further, Sher teaches that the aforementioned services may be rendered electronically by processing transactions using the computing platform 14, the card read/write device 12, and the database 10. (Paragraph 0032; paragraph 0038). However, Sher fails to teach or suggest that the computing platform 14, the card read/write device 12 and the database 10 are installed at a ticket gate of a public transportation facility, as recited in claims 8, 22 and 36.

In fact, Sher fails to make any mention or suggestion of a public transportation facility whatsoever. As a result, Applicant respectfully submits that claims 8, 22 and 36 are patentably distinguishable over Howard, Sehr, and any combination thereof, for *at least* these reasons.

Furthermore, the grounds of rejection allege, without offering any factual support, that the service-providing facilities taught in Sher may include a public transportation facility, as recited in claims 8, 22 and 36. (Office Action page 7, lines 3-4). Applicant respectfully disagrees with the grounds of rejection.

Sher plainly teaches that the service providers, as disclosed therein, include “individuals that support the card’s usage and the system’s operations, as well as render a plurality of products and services to the visitors attending the event.” (Paragraph 0028). For example, Sher teaches that such service providers comprise fast food vendors, retail outlets, concession stand owners, promoters of collectors cards, Internet service and content providers, a bank or financial institution, a credit reporting firm, a transaction processor, or a certification center. (Paragraph 0028). However, Sher provides no teaching or suggestion that the service-providing facilities taught therein may include a public transportation facility, and the Examiner has not provided any evidentiary basis for this allegation. Hence, Applicant respectfully submits that claims 8, 22 and 36 are patentably distinguishable over Howard, Sehr, and any combination thereof, for *at least* these reasons.

Independent claims 8, 22 and 36 further recite:

...wherein when an authenticated client enters
said public transportation facility, said
authentication terminal records a departing
station.

The grounds of rejection fail to point to any specific portion of either Howard or Sher that teaches or suggests the above feature. Indeed, neither Howard, Sehr, nor any combination thereof, teaches that when an authenticated client enters a public transportation facility, an authentication terminal records a departing station, as recited in claims 8, 22 and 36.

As discussed above, Sher fails to provide any teaching or suggestion whatsoever regarding a public transportation facility. Further, even if the service providing facilities disclosed in Sher did correspond to “a public transportation facility,” as recited in claims 8, 22

and 26, which Applicant firmly submits they do not, Sher nevertheless fails to teach or suggest that when an authenticated client enters a service providing facility, an authentication terminal records a departing station, as further recited in claims 8, 22 and 26.

In contrast, Sher teaches that when a visitor re-enters a premises where a sporting event or entertainment program takes place, after temporarily exiting the premises, the control modules 111 and 112 may verify an admission stamp and update it with the time of re-entry. (Paragraph 0051; paragraph 0053). However, Sher provides no teaching or suggestion whatsoever that, when an authenticated client enters or re-enters the event premises, the control module records a departing station, as recited in claims 8, 22 and 36. (*See e.g.*, Paragraph 0052).

In fact, Sher teaches quite the opposite—that the control module compiles a corresponding exit stamp comprising the location of the exit, only when a visitor wants to temporarily exit the premises where an event takes place. (Paragraph 0053). That is, Sher teaches that when a visitor exits the premises (i.e., not when the visitor enters a service providing facility, as required by claims 8, 22 and 36), the control module compiles the exit location.

Further, one of ordinary skill in the art would not have been motivated to modify the system taught in Sher to record a departing station when a visitor enters the entertainment event premises. The fundamental purpose to which Sher is directed is to provide a ticketing system for the admission to the premises of entertainment events. (*See e.g.*, Abstract). Thus, Sher teaches that when a visitor enters through an entrance gate, if the visitor card is authentic, the control modules installed at the entrance gate allow the visitor to enter the premises of the entertainment event. (Paragraph 0052). Therefore, it would run contrary to the fundamental teachings of Sher

to modify the admission system disclosed therein to, when a visitor enters through an entrance gate, record the entrance gate as a departing station, as recited in claims 8, 22 and 36, because Sher is directed to a system for providing admission to the event and not for providing departure from the event.

Accordingly, Applicant respectfully submits that claims 8, 22 and 36 would not have been obvious from Howard, Sher, and any combination thereof for *at least* these reasons and, therefore, requests that the Examiner withdraw these rejections.

B. Independent Claims 11-12, 25-26 and 39-40

Independent claims 11-12, 25-26 and 39-40 recite (among other things):

...wherein when said authentication server does not detect a match between said authentication information input from said authentication terminal and said personal authentication data, said authentication server notifies said authentication terminal that the client is not authenticated..

In view of the similarity between these requirements and the requirements discussed above with respect to independent claims 8, 22 and 36, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claims 8, 22 and 36 apply *at least* by analogy to claims 11-12, 25-26 and 39-40. As discussed above, Howard fails to teach or suggest the feature of when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated. Further, Sehr also fails to teach or suggest this feature. As such, it is respectfully submitted that

claims 11-12, 25-26 and 39-40 are patentably distinguishable over Howard, Sehr, and any combination thereof, for *at least* these reasons.

Additionally, independent claims 11, 25 and 39 further recite:

...wherein said authentication terminal is
installed at a government officer's window for
one of various procedures...

The Examiner acknowledges that Howard does not teach or suggest an authentication terminal, wherein said authentication terminal is installed at a government officer's window for one of various procedures, as recited in claims 11, 25 and 39. (Office Action page 8, lines 2-6). Nevertheless, the grounds of rejection rely on Sher as allegedly teaching or suggesting this feature. (Office Action page 8, lines 13-14). Applicant respectfully disagrees with the grounds of rejection.

Again, the Examiner baldly asserts that the teachings in Sher that "[t]he system and methods allow the issuance of a multi-service visitor card to individuals for the admission to events such as sporting activities or other entertainment programs, as well as for the electronic rendering of services," corresponds to the feature of "wherein said authentication terminal is installed at a government officer's window for one of various procedures," as recited in claims 11, 25 and 39. (Office Action page 8, lines 2-6). However, the Examiner does not provide any evidentiary support whatsoever for this assertion and has, therefore, failed to establish the requisite factual basis to support a determination of obviousness.

Furthermore, Sher fails to teach or suggest the feature of an authentication terminal installed at a government officer's window for one of various procedures, as recited in claims 11, 25 and

39. To the contrary, as already discussed, Sher teaches that services may be rendered to visitors such as fast food vending services, retail outlet services, concession stand services, souvenir vending services, and internet services. (Paragraph 0028, lines 5-7). Further, Sher teaches that the aforementioned services may be rendered electronically by processing transactions using the point of sale terminal 313, the database scheme 110, and the card read/write device 311.

(Paragraph 0056 – 0057; Figure 3). However, Sher does not teach or suggest that the point of sale terminal 313, the database scheme 110, and the card read/write device 311 are installed at a government officer's window for one of various procedures, as recited in claims 11, 25 and 39.

In addition, Sher also teaches that services such as advance ticket purchase services, etc. may be rendered electronically to remote locations (e.g., a home or business premises) by processing transactions using the computing platform 14, the card read/write device 12 and the database 10. (Paragraph 0032; paragraph 0038; paragraph 0134). However, Sher fails to teach or suggest that the computing platform 14, the card read/write device 12 and the database 10 are installed at a government officer's window for one of various procedures, as recited in claims 11, 25 and 39.

In fact, Sher fails to make any mention or suggestion of a government officer's window whatsoever. As a result, Applicant respectfully submits that claims 11, 25 and 39 would not have been obvious from Howard, Sehr, and any combination thereof, for *at least* these reasons.

Further, independent claims 11, 25 and 39 recite:

...wherein said authentication terminal... is configured to request said authentication server to receive an application for said procedure when the client is authenticated during said identification...

The Examiner acknowledges that Howard does not teach or suggest an authentication terminal which is configured to request an authentication server to receive an application for a procedure when the client is authenticated during said identification, as recited in claims 11, 25 and 39. (Office Action, page 8, lines 2-9). Even so, the grounds of rejection rely on Sher as allegedly teaching or suggesting this feature. (Office Action page 8, lines 16-17). Applicant respectfully disagrees with the grounds of rejection.

Neither Howard, Sher, nor any combination thereof, teaches or suggests an authentication terminal, wherein the authentication terminal is configured to request an authentication server to receive an application for a procedure when the client is authenticated during said identification, as recited in claims 11, 25 and 39. Moreover, the grounds of rejection fail to point to any specific portion of either Howard or Sher that teaches or suggests this feature.

Indeed, claims 11, 25 and 39 all recite the feature of requesting an authentication server to receive an application for a procedure. By way of illustration, the specification points out that such an application may include applications for various government licensing procedures. (*See e.g.*, page 27, line 27 – page 29, line 4). However, neither Howard nor Sher provide any teaching or suggestion whatsoever regarding requesting an authentication server to receive an application for a procedure of any kind, as recited in claims 11, 25 and 39.

Therefore, Applicant respectfully submits that claims 11, 25 and 39 are patentable over Howard, Sher, and any combination thereof, for *at least* these reasons. Hence, Applicant respectfully requests that the Examiner withdraw these rejections.

C. Independent Claims 13, 27 and 41

Independent claims 13, 27 and 41 recite (among other things):

...wherein said authentication terminal is configured to calculate an amount of time that a client is in the facility.

The grounds of rejection allege acknowledge that Howard fails to teach or suggest the above feature. Yet, the grounds of rejection rely on paragraph 0053 of Sher as allegedly teaching or suggesting this feature. Applicant respectfully disagrees with the grounds of rejection.

Neither Howard, Sher, nor any combination thereof, teaches an authentication terminal, wherein said authentication terminal is configured to calculate an amount of time that a client is in the facility, as recited in claims 13, 27 and 41. In fact, Sher teaches quite the opposite—that a control module at the entrance gate disclosed therein determines the amount of time that a visitor card has been outside of the event premises. (Paragraph 0053, lines 1-14). Specifically, Sher teaches that when a visitor wants to temporarily exit the premises where the event takes place, but return without having to pay another admission fee, then the control module at a particular exit gate compiles a corresponding exit stamp comprising the time and location of the exit. (Paragraph 0053, lines 1-8). Further, Sher teaches that when the visitor attempts to re-enter, the control module at the entrance gate determines whether the visitor card has been presented at the

entrance gate within a reasonable time after temporarily exiting the premises. (Paragraph 0053, lines 1-14).

Therefore, Sher teaches determining the amount of time that a visitor card has been outside of the event premises for the purpose of determining whether a visitor is permitted to re-enter the event premises without having to pay an additional admission fee. Sher provides no teaching or suggestion whatsoever regarding an authentication terminal which is configured to calculate an amount of time that a client is in the facility, as recited in claims 13, 27 and 41.

Accordingly, Applicant submits that claims 13, 27 and 41 are patentable over the applied references for *at least* these independent reasons. Hence, Applicant respectfully requests that the Examiner withdraw these rejections.

VI. Claim Rejections under 35 U.S.C. § 103 – Howard in view of Sher and further in view of Katz

The Examiner has rejected claims 9, 23 and 37 under 35 U.S.C. §103(a) as being unpatentable over Howard, in view of Sehr, and further in view of US Publication No. 2004/0243431 to Katz (hereinafter “Katz”). Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

Independent claims 9, 23 and 37 recite (among other things):

...wherein when said authentication server does not detect a match between said authentication information input from said authentication terminal and said personal authentication data, said authentication server notifies said authentication terminal that the client is not authenticated...

In view of the similarity between these requirements and the requirements discussed above with respect to independent claims 8, 22 and 36, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claims 8, 22 and 36 apply *at least* by analogy to claims 9, 23 and 37. As discussed above, Howard fails to teach or suggest the feature of when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated. Further, Sehr and Katz also fail to teach or suggest this feature. As such, it is respectfully submitted that claims 9, 23 and 37 are patentably distinguishable over Howard, Sher, Katz, and any combination thereof, for *at least* these reasons.

Further, independent claims 9, 23 and 37 recite:

...wherein when a communication using said public telephone starts, said public telephone records a start time and a destination of said communication.

The Examiner acknowledges that neither Howard nor Katz teach or suggest the above feature. (Office Action, page 10, lines 9-11, lines 18-19). Accordingly, the grounds of rejection rely on paragraph 0074 of Katz as allegedly teaching this feature. (Office Action, page 10, lines 18-19). Applicant respectfully disagrees with the grounds of rejection.

Neither Howard, Sher, Katz, nor any combination thereof, teaches that when a communication using a public telephone starts, said public telephone records a start time and a destination of said communication, as recited in claims 9, 23 and 37. In stark contrast, Katz teaches that a computer 24 (and a software routine associated with the program 36 and memory

34 located within computer 24), time stamps the telephone transaction record to reflect the start time of the call.

Katz teaches a computer system which includes hardware for interfacing with the public telephone network. (Abstract). As taught in Katz, the computer 24 receives telephone calls from the telephones 16 and generates various reports 26 based on the information transmitted by the telephones 16. (Paragraph 0041). Katz teaches that the computer 24 is comprised of memory 34, which is associated with a program 36. (Paragraph 0044; paragraph 0045). In particular, paragraph 0074, which is relied upon by the grounds of rejection, describes software routines which are associated with the program 36, which are executed by the computer 24. (Paragraph 0072). Therefore, Katz teaches that the software routine “off hook exit” 98, which is executed by the computer 24, time stamps the call transaction record to reflect the start time of the call. Consequently, Katz does not teach or suggest, that the public telephones 16 record a start time and a destination of said communication, as recited in claims 9, 23 and 37.

Accordingly, Applicant submits that claims 9, 23 and 37 are patentable over the applied references for *at least* these independent reasons. Thus, Applicant respectfully requests that the Examiner withdraw these rejections.

VII. Claim Rejections under 35 U.S.C. § 103 – Howard in view of Tsiounis and further in view of Van Till

The Examiner has rejected claims 14, 28 and 42 under 35 U.S.C. §103(a) as being unpatentable over Howard and Tsiounis in view of U.S. Patent No. 6,404,337 to Van Till *et al.* (hereinafter “Van Till”). Applicant respectfully traverses these rejections for *at least* the reasons set forth below.

Independent claims 14, 28 and 42 recite (among other things):

wherein when said authentication server does not detect a match between said authentication information input from said authentication terminal and said personal authentication data, said authentication server notifies said authentication terminal that the client is not authenticated...

In view of the similarity between these requirements and the requirements discussed above with respect to independent claims 8, 22 and 36, Applicant respectfully submits that the foregoing arguments as to the patentability of independent claims 8, 22 and 36 apply *at least* by analogy to claims 14, 28 and 42. As discussed above, Howard fails to teach or suggest the feature of when an authentication server does not detect a match between authentication information input from an authentication terminal and personal authentication data, the authentication server notifies said authentication terminal that the client is not authenticated. Further, Tsiounis and Van Till also fail to teach or suggest this feature. As such, it is respectfully submitted that claims 14, 28 and 42 are patentably distinguishable over Howard, Tsiounis, Van Till, and any combination thereof, for *at least* these reasons.

Independent claims 14, 28 and 42 further recite:

wherein when said relevant registration is for registration of the client's change of address or the change of the client's seal, the authentication server executes a process corresponding to said relevant registration.

The Examiner acknowledges that neither Howard, nor Tsiounis teaches or suggests the above feature. Even so, the grounds of rejection rely on claim 8 of Van Till as allegedly teaching this feature. Applicant respectfully disagrees with the grounds of rejection.

Neither Howard, Tsiounis, Van Till, nor any combination thereof, teaches that when a relevant registration is for registration of the client's change of address or the change of the client's seal, an authentication server executes a process corresponding to said relevant registration, as recited in claims 14, 28 and 42. Claim 8 of Van Till teaches a method for registering a digital signature. (See claim 8). However, Van Till makes no mention whatsoever regarding a client's seal. Furthermore, Van Till fails to teach or suggest the feature of executing a process corresponding to a relevant registration, when the relevant registration is for the change of a client's seal, as required by claims 14, 28 and 42.

Consequently, Applicant submits that claims 14, 28 and 42 are patentable over the applied references for *at least* these independent reasons. Hence, Applicant respectfully requests that the Examiner withdraw these rejections.

IV. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.116
U.S. Serial No. 09/838,319

Attorney Docket No.: Q64153

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

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